

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

TRENESHA BIGGERS, Millania  
FLOWERS, [REDACTED] ZYUN SIMS

Fill in above the full name of each plaintiff or petitioner.

Case No. \_\_\_\_\_ CV \_\_\_\_\_

-against-

THE STATE OF TEXAS, NEW YORK ACS,  
EL PASO CHILD PROTECTIVE SERVICES,  
SUFFOLK COUNTY NY, SHIRLEY Police  
DEPARTMENT, NYPD, "See attached DEFENDANT LIST"

Fill in above the full name of each defendant or respondent.

DECLARATION

In support of Petition To Show Cause For  
"Preliminary Injunction and Temporary Restraining Order"

Briefly explain above the purpose of the declaration, for example, "in Opposition to Defendant's Motion for Summary Judgment."

I, TRENESHA BIGGERS, declare under penalty of perjury that the

following facts are true and correct:

In the space below, describe any facts that are relevant to the motion or that respond to a court order. You may also refer to and attach any relevant documents.

"SEE Attached"


The Defendants named collectively conspired  
to kidnap PLAINTIFF and her two children  
from Brighter Tomorrows Domestic Violence  
Shelter. PLAINTIFF and her children M.F. and Z.S.

were hunted down after PLAINTIFF filed Congressional inquiries regarding military sexual assault and violence. PLAINTIFF, or "BIGGERS" has been falsely arrested multiple times as a favor to BIGGERS ex in attempt to kidnap her children. If this court does not intervene and grant Injunctive Relief and a Temporary Restraining Order, the named individuals and agencies will continue to unlawfully conceal BIGGERS kidnapped children, and continue to deprive BIGGERS of her life, liberty, and pursuit of happiness. Furthermore, the actions described in this related 1983 complaint are continuous. Law enforcement has been assisting the named individuals and entities in terrorizing BIGGERS and kidnapping her children. Law Enforcement, including the NYPD ignored BIGGERS request to report her children missing. As a result of the named actions BIGGERS + her children have suffered irreparable injury. BIGGERS prays this Court grant an Ex-Parte Temporary Restraining Order for the sake of Justice, To Preserve the Status Quo.

Attach additional pages and documents if necessary.

10/08/2022

Executed on (date)

  
Signature

TRENESHIA BIGGERS  
Name

Prison Identification # (if incarcerated)

246 E 51<sup>st</sup> St  
Address

NEW YORK, NY  
City

10022  
State Zip Code

Telephone Number (if available)

E-mail Address (if available)

**Defendant List Continued**

FBI

National Center for Missing and Exploited Children

Dona Ana County New Mexico Sheriff

Las Cruces Police Department

Sigma Phi Epsilon

Alpha Kappa Alpha Sorority

Omega Psi Phi Fraternity Inc

Iota Phi Theta Fraternity

Eminem

Sheldon JACKLER individually and in his full capacity

Ping-Peng Jackler individually and in her full capacity

Stockbridge Holdings

Rita Jackler individually and in her full capacity

Chad Jeffs individually and in his full capacity

Otis Gregory Pitts individually and in his full capacity

Nick Mitchell individually and in his full capacity

Xavier Fulton individually and in his full capacity

Kurt Angle individually and in his full capacity

Ephram Sims individually and in his full capacity

Dawn Hough individually and in her full capacity

Derek Andersen individually and in his full capacity

Gregory Anastasia individually and in his full capacity

Mike Mizanan individually and in his full capacity

Maryse Oulette individually and in her full capacity

“The Bella Twins”

Nikki-Stephanie Bella individually and in her full capacity

Deep South Wrestling Talent Doe 1-75

Florida Championship Wrestling Talent Doe 1-1000

Florida Championship Wrestling

Steve Keirn individually and in his full capacity

Billy Corgan individually and in his full capacity

NWA

Lionel Jean Baptiste

Angela Zane

Detective Doe 1-100

Nathan Everhart

Panda Energy

Con Ed

El Paso Electric

Home Depot

Sports Authority

City of Lynnwood

Lynnwood Police Department

Giovanna Yanotti individually and in her full capacity

Heath Wallace Miller individually and in his full capacity

Kameron Wimbley

Chris Benoit

Sandra Wright individually and in her full capacity

Bank of America

GAP

DOUBLE TREE

SOUTHERN ILLINOIS UNIVERSITY

UNIVERSAL STUDIOS

SEA WORLD

DELTA AIRLINES

Syracuse

Paula White



Jonathan Cain

Pzier Labs

Abbot Laboratories

MAC

MACK

Lifetime

Tyra Banks

Naomi Campbell

Tony Khan individually and in his full capacity

All Elite Wrestling

World Wrestling Entertainment

Wrestling Promotion Doe 1-1000

Buick

Lincoln

PROCTOR U

Airline Doe 1-50

Enterprise

Hertz

Rental Car Company Doe 1-50

NYU Hospital

LSAC

IMAX

Warner Brothers

Dwayne Johnson

Mark Jindrak

Michael Jordan

Jacob Chester Williams individually and in his full capacity

Villanova

Loyola

Cecile Reynaud

University of Pennsylvania

Penn State University

University of Pittsburgh

University of Florida

Harley Davidson

Owner-Developer Doe 1-100

Avesta

Hanover

Yale

Harvard

Lawrence Vanhoor

Anita Thornton

Jean Lawrence

Petulah Marcia Wilson

Ephram Frank Sims

Daniella Marcunez

Ada Anoai Jr

FORD

Liberty Insurance

Metro PCS

Microsoft

Verizon

Sprint

TMobile

Maybach

Mick Foley

Jim Cornette

John and Jane Doe of Jacksonville High School 1-10000

Gloria Jean's

Victoria's Secret

Pod hotels

Anita Thornton

TJ Max

TJ Wilson

Alberta Amateur

VISA

STAPLES

KINKOS

CVS

WALGREENS

DUANE READE

USPS

DHL

MCDONALD'S

WENDYS

STAPLES

Jeff Jarrett

Karen Jarrett

Ron Simmons

Norman Smiley

Sharmell Sullivan Huffman

Booker T Huffman

The Reality of Wrestling

STATE OF ILLINOIS

STATE OF CONNECTICUT

CHEVY DODGE CHRYSLER

UNITED STATES OF AMERICA

Lionel Jean Baptiste individually and in his full capacity

City of Lynnwood

Lynnwood Police Department

Giovanna Yanotti

Heath Wallace Miller

John William Robinson

Derrick Robinson

Ephram Sims

“Drew Tallahassee”

Ashley Martinez

Shelly Martinez

All Elite Wrestling

Brandy Rhodes

Cody Rhodes

Cornerstone

Matthew Hager

Bexar County District Attorney’s Office

Alma Fulton

Amanda Fulton

Scott Reid

Scott DAmote

John Thomas Huett

Gucci

Chanel

Taco Bell

Tiffany &Co

Late Night Library

Chubbys Nightclub

Nightclub Doe 1-100

Hotel Doe 1-100

Petco

The Smith

Lagos State

Equinox

Crunch Fitness

Wilson

William Regal

Lacey DeMott

Lacey Von Eric

E!

A&E

Aabc

NBC

MSNBC

FLORIDA STATE UNIVERSITY

UNIVERSITY OF SOUTH FLORIDA



ILLINOIS STATE University  
Tow Truck Company Doe 1-15  
Dave Taylor  
Larry Wilson  
Vince Elam  
Kameron Wimbley  
Chris Benoit  
Penn State University  
University of Pittsburgh  
University of Florida  
USPS  
DHL  
MCDONALD'S  
WENDYS  
STAPLES  
Jeff Jarrett  
Karen Jarrett  
Sharmell Sullivan Huffman  
Booker T Huffman  
The Reality of Wrestling

STATE OF ILLINOIS  
STATE OF CONNECTICUT  
CHEVY DODGE CHRYSLER  
UNITED STATES OF AMERICA  
Stephanie McMahon  
Everest University  
Tim McGill individually and in his full capacity  
Isaac Wright  
Jimmy Hart  
Vince Russo  
Mike Bucci  
Diedra Cobb  
Diedra Huett  
Sutton Place Synagogue

Hope Huett  
Bill DeMott  
JBL  
Randy Orton  
Mike Shane  
Todd Shane

Tim McGill  
The Urby  
Sterling

ATL  
Tap out  
UFC  
McDonough Ga  
McDonough Police Department  
Fraternal Order of Police  
LLUSA  
All Elite Wrestling  
World Wrestling Entertainment  
MMG  
Talent Agency for 1-50  
Production Company Doe1-100  
MTV  
VH1  
Bunim Murray

Hope Elam  
Mechelle Bailey Moore  
Charles Moore

Cindy Freudland  
Randy White  
Anna" Williams  
Diana Huett  
Clarence Williams

Dentist  
Sysco  
Tyrus  
Fox News  
CNN  
Alyssa Nava  
Kelly Beck  
Dara Khautisen  
Stamford CT. Housing authority  
Bayonne Housing Authority  
County Doe 1-100  
State Doe 1-50  
LAPD  
JACKSONVILLE PD  
JACKSONVILLE HIGH SCHOOL  
SCHOOL DISTRICT 117  
URBANA HIGH SCHOOL  
ATLANTA PD  
FLORIDA STATE UNIVERSITY

UT Austin  
TAMPA PD  
Corinthian Colleges

JEEP  
Anita  
Tropicana Homes  
Cash App  
Venmo  
Medicaid  
Tampa General Hospital  
Hospital Doe 1-50  
Child Protective Services Doe 1-50  
Ineke ALDERTS  
VIRGINIA JOHNSON  
Larry Lawrence  
Tyler Perry  
Spike Lee  
Eric Adams

Department of Family and Children Service  
Houston DV Shelter 1-100  
" Mercedes Benz of Shelters"  
Reality Of Wrestling  
Booker T  
Sharmell  
Kane

Glenn Fulton  
Xavier Fulton  
Leroy Ekechuwu  
Zach Fulton  
Ashley Longpre  
Erin Longpre  
NFL  
NBA  
NCAA  
NJCAA  
LFL

ILLINOIS CENTRAL COLLEGE  
COLLEGE OF SOUTHERN IDAHO  
NYLAG  
EL PASO RIO GRANDE LEGAL AID  
Legal Aid Society  
STEPHANIE JAMES

EL PASO COUNTY OFFICE OF THE PROSECUTOR  
SUFFOLK COUNTY OFFICE OF THE PROSECUTOR  
City of El Paso Texas  
State of Colorado  
YWCA Pueblo  
CITY OF Markham  
Markham Sheriff  
Chicago PD  
City of Chicago  
URBANA Illinois  
El Paso Constable  
City of Chicago  
Lori Lightfoot  
Jesse Jackson  
Al Sharpton

University Doe 1-100  
Corcoran Real Estate  
Wesley Cochran  
Glen Fulton  
Jennifer Adkins  
Jennifer Thomas  
Gail Kim  
Jennifer Kim  
Non profit Doe 1-100  
Barbizon  
Grant EP  
El Paso Chihuahuas  
University of Illinois  
Life Span  
Chicago Legal Aid  
Reynold's House  
CASFV  
JIMMY CARTER  
JIMMY HART  
OWNER Developer DOE 1-100s  
Property Management Doe 1-100  
Staffing Company Doe 1-100  
Jacksonville High School District  
The Buckle  
Gloria Jean's  
Delta  
LA Fitness  
  
LAPD



Oxygen  
NYPost  
ASSOCIATED PRESS  
TMZ  
Hard Rock  
Bunim Murray-MTV  
VH1  
Jacksonville Police -City  
Morgan County  
Tampa PD  
NYHCA  
Lori Appleton  
ERIK APPLE  
LIONSGATE  
Theresa Caballero

Dave Hawk  
Wes Chocoran  
Constable  
Abundant Faith  
Circle C Ranch  
PetSmart  
Marry Murray  
Judge Ables  
Sam Medrano  
Yvonne Rosales  
McKenzie Cloisen  
Rosemary Law  
Sandra Lawrence  
Savannah Lawrence  
Stacey Lawrence

Detective Munger  
Der Vera  
Angela Zane

Alyssa Nava  
Ashley Martinez  
Michelle Santicola  
Mike Santicola  
Ouisa Davis  
Bubba the Love Sponge  
Sinclair Broadcast Group  
Sue Sinclair  
College Club  
Publix

Flying J  
GNC  
HSN  
PNC BANK  
CHASE BANK  
Stan Bernstein  
University of South Florida  
Milestone  
Greystar  
Beto O'Rourke  
Eduardo Lerma  
Eduardo Lerma JR  
Greg Anderson  
Veronica Escobar  
Ruth Reyes  
Rafael Morales  
Ismael Pease  
El Paso Mother's Against Family Court Abuse  
Camden  
Facebook  
Instagram  
Burberry  
Dior  
Bruce Tharpe  
Florida State University  
University of Florida  
University of South Florida  
University of Illinois  
University of Tennessee  
UT Austin  
University of Michigan  
UCLA

Sterling  
Starbucks  
Hooters  
Victoria's Secret  
Best Buy  
Kinkos  
Ineke ALDERTS  
CPs worker 1-20

Grand Central Kennedy  
Carle Hospital  
PROVIDE HOSPITAL  
DR Doe 1-100

City of Tallahassee  
Leon County  
The Roosevelt  
University of Illinois  
TB Joshua  
SCOAN

Lori Lightfoot  
Yahara  
ROSENBAUM  
Kevin Dunn?  
Nike

Alexa Models

John Robinson  
Virginia Johnson Travis  
Carlos Boozer  
Terry Taylor  
Bob Ryder  
Chris Benoit  
Bill DeMott  
(Dave Taylor /William Regal?)  
Mike Knox  
Jody Hamilton

Joe Bartlett  
Joseph Ekechuwu  
Mike Shane  
Todd Shane  
Allan Funk  
Steve Shipp  
Veronica  
Alex  
Malenko  
Neuropsychiatric Institute  
Gold's Gym  
Powerhouse  
Gloria Jean's

Lionsgate  
Fox  
USA?

AAA - Lucha Libre

WOW  
NWA  
NFL  
WNBA (NBA)

Chavo Guerrero  
Marty  
Randy Orton  
Ricky Steamboat  
Jeff Jarrett  
Karen Jarrett  
Safe Horizons  
DV Shelters  
Trevino Place  
Chicago Public Schools  
Giovanna  
Lyndsey Hayward  
Shelton Benjamin

Diedra Cobb  
Brittany Knapp  
Lacey Von Eric  
Afa Anoa'i  
Clarence Williams  
Maxamillion  
John Huett  
Doris Williams  
Letitia James  
Bruce Tharpe  
Billy Corgan  
Dixie Carter  
Jim Ross  
Dean Malenko  
Sterling  
Ramada Las Cruces  
HR Block  
PNC Bank  
David Wolkinson  
HR Block.  
Kurt Angle  
Scott Rechsteiner  
Brian King  
Avesta  
Kinder Care  
UHaul



Airforce  
Dee Margo  
Norrise Lawrence  
Larry Lawrence  
School District 117  
Jacksonville High School  
Urbana High School

**Defendant List Continued**

Lionel Jean Baptiste individually and in his full capacity  
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Heath Wallace Miller  
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Anna" Williams  
Diana Huett  
Clarence Williams

Dentist  
Sysco  
Tyrus  
Fox News  
CNN  
Alyssa Nava  
Kelly Beck  
Dara Khautisen  
Stamford CT. Housing authority  
Bayonne Housing Authority  
County Doe 1-100  
State Doe 1-50  
LAPD  
JACKSONVILLE PD  
JACKSONVILLE HIGH SCHOOL  
SCHOOL DISTRICT 117  
URBANA HIGH SCHOOL  
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Venmo  
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Spike Lee  
Eric Adams

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Leroy Ekechuwu  
Zach Fulton  
Ashley Longpre  
Erin Longpre  
NFL  
NBA  
NCAA  
NJCAA  
LFL

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COLLEGE OF SOUTHERN IDAHO  
NYLAG  
EL PASO RIO GRANDE LEGAL AID  
Legal Aid Society  
STEPHANIE JAMES



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Markham Sheriff  
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City of Chicago  
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Al Sharpton

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Glen Fulton  
Jennifer Adkins  
Jennifer Thomas  
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Jennifer Kim  
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Grant EP  
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University of Illinois  
Life Span  
Chicago Legal Aid  
Reynold's House  
CASFV  
JIMMY CARTER  
JIMMY HART  
OWNER Developer DOE 1-100s  
Property Management Doe 1-100  
Staffing Company Doe 1-100  
Jacksonville High School District  
The Buckle  
Gloria Jean's  
Delta  
LA Fitness  
  
LAPD

Oxygen  
NYPost  
ASSOCIATED PRESS  
TMZ  
Hard Rock  
Bunim Murray-MTV  
VH1  
Jacksonville Police -City  
Morgan County  
Tampa PD  
NYHCA  
Lori Appleton  
ERIK APPLE  
LIONSGATE  
Theresa Caballero

Dave Hawk  
Wes Chocoran  
Constable  
Abundant Faith  
Circle C Ranch  
PetSmart  
Marry Murray  
Judge Ables  
Sam Medrano  
Yvonne Rosales  
McKenzie Cloisen  
Rosemary Law  
Sandra Lawrence  
Savannah Lawrence  
Stacey Lawrence

Detective Munger  
Der Vera  
Angela Zane

Alyssa Nava  
Ashley Martinez  
Michelle Santicola  
Mike Santicola  
Ouisa Davis  
Bubba the Love Sponge  
Sinclair Broadcast Group  
Sue Sinclair  
College Club  
Publix

Flying J  
GNC  
HSN  
PNC BANK  
CHASE BANK  
Stan Bernstein  
University of South Florida  
Milestone  
Greystar  
Beto O'Rourke  
Eduardo Lerma  
Eduardo Lerma JR  
Greg Anderson  
Veronica Escobar  
Ruth Reyes  
Rafael Morales  
Ismael Pease  
El Paso Mother's Against Family Court Abuse  
Camden  
Facebook  
Instagram  
Burberry  
Dior  
Bruce Tharpe  
Florida State University  
University of Florida  
University of South Florida  
University of Illinois  
University of Tennessee  
UT Austin  
University of Michigan  
UCLA

Sterling  
Starbucks  
Hooters  
Victoria's Secret  
Best Buy  
Kinkos  
Ineke ALDERTS  
CPs worker 1-20

Grand Central Kennedy  
Carle Hospital  
PROVIDE HOSPITAL  
DR Doe 1-100

City of Tallahassee  
Leon County  
The Roosevelt  
University of Illinois  
TB Joshua  
SCOAN

Lori Lightfoot  
Yahara  
ROSENBAUM  
Kevin Dunn?  
Nike

Alexa Models

John Robinson  
Virginia Johnson Travis  
Carlos Boozer  
Terry Taylor  
Bob Ryder  
Chris Benoit  
Bill DeMott  
(Dave Taylor /William Regal?)  
Mike Knox  
Jody Hamilton

Joe Bartlett  
Joseph Ekechuwu  
Mike Shane  
Todd Shane  
Allan Funk  
Steve Shipp  
Veronica  
Alex  
Malenko  
Neuropsychiatric Institute  
Gold's Gym  
Powerhouse  
Gloria Jean's

Lionsgate  
Fox  
USA?

AAA - Lucha Libre

WOW  
NWA  
NFL  
WNBA (NBA)

Chavo Guerrero  
Marty  
Randy Orton  
Ricky Steamboat  
Jeff Jarrett  
Karen Jarrett  
Safe Horizons  
DV Shelters  
Trevino Place  
Chicago Public Schools  
Giovanna  
Lyndsey Hayward  
Shelton Benjamin

Diedra Cobb  
Brittany Knapp  
Lacey Von Eric  
Afa Anoa'i  
Clarence Williams  
Maxamillion  
John Huett  
Doris Williams  
Letitia James  
Bruce Tharpe  
Billy Corgan  
Dixie Carter  
Jim Ross  
Dean Malenko  
Sterling  
Ramada Las Cruces  
HR Block  
PNC Bank  
David Wolkinson  
HR Block.  
Kurt Angle  
Scott Rechsteiner  
Brian King  
Avesta  
Kinder Care  
UHaul

Airforce  
Dee Margo  
Norrise Lawrence  
Larry Lawrence  
School District 117  
Jacksonville High School  
Urbana High School

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

TRENESHA BIGGERS, MILLANIA FLOWERS, ZYYON SIMS

Write the full name of each plaintiff.

\_\_\_\_\_ CV \_\_\_\_\_  
(Include case number if one has been  
assigned)

-against-

THE STATE OF TEXAS, EL PASO COUNTY, TEXAS THE EL PASO  
COUNTY DISTRICT ATTORNEYS OFFICE, SUFFOLK COUNTY, NY, .....  
"See Attached "

**COMPLAINT**

Do you want a jury trial?

☒ Yes ☐ No

Write the full name of each defendant. If you need more  
space, please write "see attached" in the space above and  
attach an additional sheet of paper with the full list of  
names. The names listed above must be identical to those  
contained in Section II.

**NOTICE**

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

## I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

## X Federal Question

#### ☐ Diversity of Citizenship

**A. If you checked Federal Question**

Which of your federal constitutional or federal statutory rights have been violated?

***42 USC 1981, 42 USC 1982, 42 USC 1982, 42 USC 1985, 42 USC 1986, 42 USC 1987, 42 USC 1988, 42 USC 1989***

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### B. If you checked Diversity of Citizenship

## 1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, N/A, is a citizen of the State of \_\_\_\_\_  
(Plaintiff's name)

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of \_\_\_\_\_

---

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.



If the defendant is an individual:

The defendant, \_\_\_\_\_, is a citizen of the State of \_\_\_\_\_  
 (Defendant's name) **N/A**

\_\_\_\_\_  
 or, if not lawfully admitted for permanent residence in the United States, a citizen or  
 subject of the foreign state of \_\_\_\_\_.

If the defendant is a corporation:

The defendant, \_\_\_\_\_, is incorporated under the laws of  
 the State of \_\_\_\_\_

and has its principal place of business in the State of \_\_\_\_\_

or is incorporated under the laws of (foreign state) \_\_\_\_\_

and has its principal place of business in \_\_\_\_\_.

If more than one defendant is named in the complaint, attach additional pages providing  
 information for each additional defendant.

## II. PARTIES

### A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional  
 pages if needed.

Trenesha	D.	Biggers
First Name	Middle Initial	Last Name
246 E 51 <sup>st</sup> Street #7		
Street Address		
New York, New York	New York	10022
County, City	State	Zip Code
<b>Confidential*</b> Telephone Number: _____ Email Address (if available): _____ treshabiggers@gmail.com		

**B. Defendant Information**

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:

STATE of Texas

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

Defendant 2:

El Paso County District Attorneys Office

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

Defendant 3:

El Paso County Texas

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

Defendant 4:

El Paso County Sheriff's Office

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

### III. STATEMENT OF CLAIM

Place(s) of occurrence: El Paso Texas, Las Cruces New Mexico, Pueblo Colorado, Shirley New York, New York, New York

Date(s) of occurrence:

09/29/2016- Ongoing/Current

### FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

***"SEE ATTACHED"***

**INJURIES:**

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

*"See Attached"*

#### IV. RELIEF

State briefly what money damages or other relief you want the court to order.

*"See Attached"*


**V. PLAINTIFF'S CERTIFICATION AND WARNINGS**

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

10/08/2022  
 Dated

  
 Plaintiff's Signature

TRENESHA                      BIGGERS  
 First Name                      Middle Initial                      Last Name

246 E 51st St  
 Street Address

NEWYORK                      NY                      10022  
 County, City                      State                      Zip Code

Confidential  
 Telephone Number                      Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☐ Yes    ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

If the defendant is an individual:

The defendant, N/A, is a citizen of the State of \_\_\_\_\_  
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of \_\_\_\_\_

If the defendant is a corporation:

The defendant, \_\_\_\_\_, is incorporated under the laws of the State of \_\_\_\_\_

and has its principal place of business in the State of \_\_\_\_\_

or is incorporated under the laws of (foreign state) \_\_\_\_\_

and has its principal place of business in \_\_\_\_\_

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

## II. PARTIES

### A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

<u>TRENESHA</u>	<u>D</u>	<u>BIGGERS</u>
First Name	Middle Initial	Last Name
<u>246 E 51st St #7</u>		
Street Address		
<u>NEW YORK</u>	<u>NY</u>	<u>10022</u>
County, City	State	Zip Code
<u>Confidential</u>		
Telephone Number	Email Address (if available)	



1. Now comes TRENESHA BIGGERS, Plaintiff, or "BIGGERS" who seeks relief after she and her two daughters Z.S. age 6 and M.F. age 10, were stalked across state lines by her ex husband EPHRAM SIMS, or "SIMS" while he was on active probation for family violence against BIGGERS. When SIMS was unable to locate BIGGERS and her children who were hiding from him in a domestic violence shelter; he continuously filed multiple false reports with the El Paso Police Department and El Paso County Sheriff alleging that BIGGERS, whom he was banned by a Protective Order from contacting, had kidnapped Z.S. On August 24<sup>th</sup>, 2019 the El Paso Times newspaper named BIGGERS as one of "El Paso's Most Wanted Fugitives" for the week of August 25<sup>th</sup> 2019. On August 25<sup>th</sup> 2019, the El Paso Times republished the article online. Due to BIGGERS career as a professional wrestler, numerous sports news websites republished the article claiming BIGGERS was a Crime Stopper's Most Wanted fugitive in El Paso County, Texas. There is no evidence that BIGGERS was wanted at the time of the publication. SIMS had the assistance of law enforcement including the El Paso County District Attorneys office in stalking BIGGERS ultimately abducting her and her two children Z.S. and M.F. from Brighter Tomorrows, a domestic violence shelter in New York. These events all took place with SIMS being Ordered by JUDGE MICHAEL DELEON who let SIMS off probation early while SIMS was actively violating the of Bexar County, Texas Probation terms o have "No Contact" with BIGGERS and the members of her household after she was the victim of SIMS family violence case. Multiple individuals and entities worked in unison to assisted El Paso.County Sheriff Richard Wiles and the El Paso County Texas District Attorneys Office in the stalking and kidnapping of BIGGERS , Z.S. , and M.F. from the domestic violence shelter BIGGERS and her children had taken refuge in from SIMS. Likewise multiple entities conspired to falsely imprison BIGGERS multiple times, including BIGGERS own privately retained attorneys in each state where her kidnapped children were believed to be. The facts show that by a collective effort of numerous individuals and agencies, BIGGERS, Z.S. , and M.F. have been continuously denied access to the United States Constitution even up to the very day of this filing. BIGGERS' children have remained kidnapped since October 8<sup>th</sup> ,2019. The El Paso County District Attorneys Office instructed law enforcement to not enforce BIGGERS domestic violence Protective Orders and allowed SIMS to violate the Criminal No Contact terms of his Probation in his pursuit of BIGGERS. The EL Paso County District Attorney over the course of former District Attorney JAIME EZPARZA'S administration and continuing on to the current El Paso County District Attorney YVONE ROSALES have failed to dismiss the criminal charges against BIGGERS despite the fact that they were made aware the BIGGERS had full custody of Z.S. and an Order of Protection against SIMS was presented to ESPARZA and Detective VERA by the Suffolk County Fugitive Squad . The Protective Order was provided to the El Paso authorities before BIGGERS was extradited from New York to EL Paso. While BIGGERS was in custody,New York ACS failed to bring BIGGERS and the children before a Judge. The children were then kidnapped from BIGGERS, separated from one another, and taken to two different states. BIGGERS was not able to regain contact with her children. BIGGERS would show in fact as follows that:
2. In the summer of 2015, BIGGERS moved from Tampa FL to El Paso Texas with her 4 year old daughter M.F. In August 2015,BIGGERS married SIMS. On May 17<sup>th</sup>, 2016; BIGGERS gave birth to Z.S., the child of the marriage. Prior to marrying SIMS, BIGGERS was a Professional Wrestler and

worked in the Florida real estate market. SIMS employed by the Department of Defense as an E3 in the United States ARMY.

3. On or about September 29<sup>th</sup>, 2016 BIGGERS dialed 911 from the marital residence at 3081 Tierra Salada Dr after being physically assaulted by SIMS and restricted from leaving the residence to pick up M.F. from her Socorro Independent School District elementary school. The El Paso Police Pebble Hill department arrived in response to the domestic violence call however failed to intervene. Approximately 9 days later on Randolph Airforce Base in Bexar County, Texas; October 8 2016, BIGGERS was severely beaten by SIMS until losing consciousness on Randolph Air Force Base in San Antonio, Texas. SIMS was arrested at the scene after an eyewitness called 911 as SIMS was fleeing the scene of the crime. After being arrested on Randolph Airforce Base, SIMS was promptly granted release by his Command via ALEX BROWN in El Paso at Fort Bliss. SIMS returned to El Paso by bus. BIGGERS drove back to El Paso and returned to the marital residence with newborn Z.S. and her older daughter M.F.
4. In between BIGGERS September 2016 911 Domestic Violence call and the brutal October 8<sup>th</sup> assault; by SIMS; Ineke Alerts, "ALDERTS" of El Paso Texas Child Protective Services began attempting to make contact with BIGGERS. In between the dates of September 29<sup>th</sup> 2016 and October 8<sup>th</sup> 2016; ALDERTS began her investigation by conducting interviews with BIGGERS and SIMS at their marital residence. Upon interview with ALDERTS, BIGGERS discovered that SIMS had made the call against her to Child Protective Services after he assaulted her. Upon discovery of SIMS false report by a confession from him, ALDERTS verbally reprimanded SIMS and informed BIGGERS that case would be classified as "unfounded".
5. About 9 days later and after SIMS attacked BIGGERS on Randolph Airforce Base leaving her disfigured, BIGGERS contacted ALDRETS again to let her know about her injuries and her fear for herself, Z.S. and M.F. ALDERTS responded to BIGGERS by telling her that she wasn't assigned to that case and could not assist her. ALDERTS refused to make a safety plan, disclosed that she had spoken with XAVIER FULTON "FULTON", the estranged father of M.F. and that she was closing the case.
6. Within the same time window as the ALDERTS investigation, CAREY CURRAN, "CURRAN" of Fort Bliss Family Advocacy Program also requested an interview with BIGGERS as they interviewed SIMS. Again, SIMS admitted that the claims to Child Protective Services were frivolous. CURRAN advised she would be closing the case. CURRAN would later go on to cover up the crime against BIGGERS and falsely classify SIMS as the victim.
7. Upon returning to El Paso after the assault, BIGGERS obtained an emergency Order of Protection from the El Paso County District Attorney's Office.
8. SIMS was arrested for violating the Order of Protection after visiting BIGGERS residence on December 25<sup>th</sup>, 2016. BIGGERS began working with the El Paso County Assistant District Attorney, MARK W. SPINN on the Protective Order violation brought by the State of Texas against SIMS.
9. Fort Bliss failed to upload SIMS warrant to their database. Likewise, Bexar County and El Paso County failed to upload SIMS active Probation case into the database.
10. BIGGERS began working with an advocate in the El Paso County Crime Victims office located in the El Paso County District Attorneys office. BIGGERS was also granted an Order of Protection by Fort Bliss that was enforceable on military property.



11. As the crime occurred on Randolph Air Force Base, BIGGERS did not have the option pursue justice through non military law enforcement agencies.
12. Eventually, SIMS failed an ARMY drug test when his urinalysis returned with cocaine. The domestic violence against BIGGERS had been swept under the rug by SIMS Command after ARMY CID found him guilty, however there was no hiding the positive test for cocaine.
13. SIMS was involuntary separated from the ARMY and given an "Other Than Honorable " discharge. Once SIMS no longer worked for the Department of Defense, local law enforcement regained jurisdiction over the original crime. BIGGERS presented her Congressional Inquiries to BETO O'ROURKE, " O'ROURKE" , ARMY Inspector General Complaints made by BIGGERS to the Pentagon, injury Photos and a recording of the assault to the Bexar County Sheriff. With less than 5 days remaining in the statute of limitations; the Bexar County Sheriff's issued a warrant for SIMS arrest for the domestic violence that disfigured BIGGERS. Once SIMS was charged, the UNITED STATE ARMY turned into a street gang terrorizing BIGGERS and her children more intensely than before.
14. BIGGERS allowed SIMS to take a plea deal that included probation and a protective order for the assault instead of going to trial. BIGGERS was represented by Attorney Bruce Tharpe in the parallel divorce action when this occurred. Bruce Tharpe conspired to have BIGGERS arrested while he was retained as her counsel.
15. Although SIMS took a plea deal, the Fort Bliss Inspector General returned BIGGERS complaints as unfounded. They also dismissed BIGGERS evidence that SIMS had stolen money from the Red Cross funds available to soldiers for travel in certain circumstances although it was obvious SIMS committed the crime.
16. BIGGERS attempted to resolve these issues through the ARMY'S open door policy available to all military spouses. BIGGERS attempts to meet with them Fort Bliss Commanding General PAT WHITE were all declined. BIGGERS JAG Attorney, attempted by written request to convince General WHITE to grant BIGGERS' open door request concerning the assault. General WHITE refused all of BIGGERS' requests. BIGGERS reported this incident to O'ROURKE'S office via a formal Congressional inquiry. It appears the O'ROURKE and his staff concealed these events and did not investigate. Likewise, O'ROURKE refused to meet with BIGGERS upon request. O'ROURKE'S MILITARY LIAISON A informed BIGGERS that their office had destroyed all records of BIGGERS' Congressional inquiry file. Next, he told BIGGERS to " get a lawyer."
17. BIGGERS was represented by the El Paso County Attorney for her Order of Protection, the listed victim in the El Paso County District Attorney's case against SIMS for violating the Order, and represented Attorney Stephanie James of Texas Rio Grande Legal Aid for the divorce case vs SIMS. Attorney Stephanie James requested of BIGGERS allow El Paso Rio Grande Legal Aid to take over BIGGERS Protective Order Case from the El Paso County Attorney. BIGGERS agreed.
18. Upon being granted permission to handle to Temporary Order of Protection and the divorce; Stephanie James informed BIGGERS that she has spoken with opposing counsel, Attorney Ismael Pease, " PEASE" and that the two of them had decided to move my protective order and the divorce to the 65<sup>th</sup> District Court, JUDGE YAHARA GUITIEREZ "GUITIEREZ" presiding. JUDGE GUTIEREZ would go on to deny BIGGERS a trial by Jury for her divorce, and then default Custody of Z.S. to the freshly convicted SIMS whom BIGGERS and Z.S. were protected from by Court Order. GUITIEREZ entered the default after BIGGERS called the Court during the lunch break informing them that she was running out of gas and need extra time to return.

19. BIGGERS hired attorney TROY BROWN and Attorney THERESA CABALLERO after JUDGE GUITIERREZ entered the default Judgement. CABALLERO filed a Motion to Recuse JUDGE GUITIERREZ. Next, GUITIERREZ recused herself, but prior to recusing herself she signed the final divorce decree that she had defaulted to the freshly convicted SIMS.
20. Although SIMS met the criminal element for the domestic violence in the Texas criminal Court, Judge GUTIERREZ denied BIGGERS request to make her civil protective order permanent. BIGGERS attorney, OUISA DAVIS, "DAVIS", then drafted a joint possession Order\*. Davis failed to disclose to BIGGERS that opposing counsel, PEASE, was her mentee. After destroying BIGHERS case, DAVIS disclosed to BIGGERS that she saw PEASE as if he were her own son. DAVIS also ordered BIGGERS false arrest as she attempted to intervene in the unlawful dispossession of BIGGERS home by Patti Olivas of Dan Olivas and Associates, Loraine Frias, and El Paso Collaborative.
21. When JAMES moved BIGGERS case to the 65<sup>th</sup> District Court; it was reserved for cases with pending Child Protective Services and for matters which are being appealed. At that time, neither applied to BIGGERS case.
22. After the first hearing concerning the STATE OF TEXAS vs SIMS for violating BIGGERS' Protective Order; Assistant District Attorney MARK SPINN, "SPINN" met with BIGGERS and explained to her that he discovered that the defendant, SIMS, was a "good friend" and "drinking partner" at SIMS then place of employment, The College Dropout. BIGGERS had been in constant communication with SPINN for the prior year leading up to trial providing SPINN evidence such as recordings of SIMS attacking BIGGERS, confessing to felonies, thousands videos, photos, Texas messages, and screenshots included in the evidence was a video of Sims violating BIGGERS' Order of Protection, and SIMS threatening to use automatic assault rifles against BIGGERS. SPINN went on to explain that for those reasons he would be recusing himself from prosecution of the case. Without explanation, the DA's office dropped the charges against SIMS.
23. After SPINN recused himself from the case, the next time BIGGERS saw him SPINN was the prosecutor working her "Interference With Public Duties" charge. SPINN was now in possession of the laptops and cell phone that BIGGERS had been sending him evidence from as well as communicating by text, email and phone calls with. SPINN came into possession of these items after they were stolen by SIMS the day BIGGERS home was unlawfully dispossessed.
24. A second violation of the protective order occurred and BIGGERS reported it to the EPPD. The charges were presented to the El Paso County District Attorneys Office and prosecution was declined.
25. BIGGERS and her victims advocate from the El Paso County District Attorney's Office met with El Paso County Attorney Chief to address the September 29<sup>th</sup> 2016 failure to intervene in the domestic violence call made to 911 by BIGGERS and the appeal the denial to prosecute the second Protective Order violation by SIMS.
26. The Chief agreed to accept the September 29<sup>th</sup> domestic violence case.
27. Nearly 3 months after the assault Fort Bliss failed to intervene and prosecute the assault.
28. BIGGERS began working at Charles Schwab and maintaining the household with just herself and her two daughters.
29. On or about November 30, 2016; Dan Olivas and Associates and El Paso Collaborative pursued an eviction against BIGGERS to remove her and her children from the marital residence. The eviction went to trial by jury. Mid trial El Paso Collaborative and Dan Olivas and Associates



verbally withdrew their eviction suit and agreed to dismiss the charges. The jury was dismissed and BIGGERS prevailed. After BIGGERS victory in the eviction suit, an unlawful Writ of Possession was issued to forcibly remove BIGGERS from her and the children's home.

30. BIGGERS hired attorney RICHARD ROMAN to stop the illegal Writ of Possession. ROMAN accepted retainer fees from BIGGERS, then filed his Motions for the case into a Court where BIGGERS eviction was not located.
31. The day the Constable executed the Writ of Possession, SIMS arrived in a UHaul truck with JACOB CHESTER WILLIAMS, LORRAINE FRIAS, "FRIAS" and THERESA of El Paso Collaborative, and two El Paso Constables, CONSTABLE 1 and CONSTABLE 2.
32. After BIGGERS win in the eviction proceedings, payments began pursuant to the settlement stemming from the eviction suits dismissal. Patti Olivas of Dan Olivas and Associates arrived at Charles Schwab, BIGGERS place of employment and picked up a rent check BIGGERS left of OLIVAS at security.
33. OLIVAS then went back to Judge UREDA and requested he issue a Writ of Possession against BIGGERS pursuant to the eviction suit despite the fact that BIGGERS had won. Although Judge UREDA dismissed the jury and the case, he issued the Writ for the Constable to take possession of BIGGERS and her children's home within 10 days.
34. SIMS arrived with CONSTABLE 1 and CONSTABLE 2. SIMS was actively robbing BIGGERS' house with the assistance of the Constable and El Paso Collaborative in direct violation of a Restraining Order.
35. BIGGER dialed 911 to report SIMS violating the active restraining order and burglarizing her home. Although dispatch stated that help was on the way, 911 never arrived. When BIGGERS attempted to retrieve items being stolen from her, CONSTABLE 1 arrested BIGGERS for "Interference With Public Duties". CONSTABLE 1 refused to acknowledge the Restraining Order that banned SIMS from the property and arrested BIGGERS instead. The Constable took BIGGERS back before Judge Jesus UREDA before taking BIGGERS to jail. BIGGERS asked UREDA to not send her to jail since she was not evicted and her home was being robbed. Judge UREDA presided over the eviction and was well aware BIGGERS won. Judge UREDA ordered BIGGERS to jail, and explained to her that he had spoken to BIGGERS previous attorney OUISA DAVIS "DAVIS", before he made his decision. Attorney Rafael Morales was the attorney appointed to BIGGERS' criminal case.
36. Eventually BIGGERS found an apartment for her and her two daughters after the unlawful dispossession of her home. As BIGGERS was about to turn into her apartment complex, she noticed red and blue lights flashing in her rearview mirror. BIGGERS decided to pull over one block from her complex, but before she could do so; a man in plain clothes and an unmarked car departed his vehicle and lunged at BIGGERS pointing a gun to her head. BIGGERS two daughters, M.F. and Z.S. were eyewitnesses and screaming in terror. It was the El Paso County Sheriff's on a city street pulling BIGGERS over. BIGGERS was given a warning ticket for "improper use of lanes" and sent on her way after being held at gunpoint.
37. A few months later, unexplainably, a warrant for BIGGERS arrest was issued by the El Paso County Sheriff for possession of marijuana. BIGGERS questioned the Sheriff directly about the warrant and was informed that it must have been "inadvertant".

38. After BIGGERS posted bail, mysteriously the Court docket reflects that BIGGERS entered a plea of not guilty before Judge Ruth Reyes. BIGGERS never appeared on the case nor entered a plea after posting bail.
39. On August 24<sup>th</sup>, 2019 El Paso Texas newspaper The El Paso Times published the Crime Stoppers Most Wanted fugitives for week of August 25<sup>th</sup>, 2019. The El Paso Times named the BIGGERS as being wanted on a felony warrant for interference with child custody on behalf of the States Complaining Witness, probationer ELHRAM SIMS. BIGGERS was not Wanted, and there is no evidence that any warrant existed at the time of the publication.
40. Detective Vera of EPPD attempted to secure an arrest warrant for BIGGERS. The presiding Judge did not find probable cause and the Warrant was not granted.
41. On \_\_\_\_\_ 2019, BIGGERS made a trip from the CASFV to pick up clothing and supplies for her daughters. Upon arrival to the residence, BIGGERS immediately spotted SIMS within 500 feet of her address. Immediately, she returned to the domestic violence shelter. Advocates attempted to report the violation to SIMS Paso County and Bexar County, Texas probation officers PROBATION OFFICER 1, PROBATION OFFICER 2, and PROBATION OFFICER 3. All three officers were non responsive with one officer acknowledging receipt of the violation information. BIGGERS also filed a police report for "Stalking". EPPD Detective Diaz presented the case to the El Paso County District Attorney. As of the filing of this suit, the case is still pending intake after nearly 3 years.
42. After the CASFV Advocates and a network of domestic violence shelters assisted BIGGERS and her daughters in transfer to a domestic violence shelter in New Mexico. The New Mexico domestic violence shelter "La Casa" placed BIGGERS and her children on a Greyhound to DOMESTIC VIOLENCE SHELTER A in Colorado. DOMESTIC VIOLENCE SHELTER A was located in \_\_\_\_\_ why BIGGERS discovers from domestic violence shelter staff that it would be unsafe for BLACK people to go grocery shopping in that town. After making contact with the Congressman O'ROURKE'S office again for help BIGGERS, Z. S. and M. F. were unexplainably kicked out of the dwelling, driven to Pueblo, Colorado around 12:00 pm and left on the side of the street. From there BIGGERS checked into the YWCA PUEBLO. They failed to protect BIGGERS, M.F. and Z.S. as well. BIGGERS had to flee from state to A after SIMS had located BIGGERS and her children hiding in each State. Before leaving New Mexico, BIGGERS obtained a civil Order of Protection that protected herself, named Z.S. as a protected party, and also protected M.F. From Colorado, ultimately BIGGERS and her two daughter were transferred to Brighter Tomorrow's, a Domestic Violence shelter in Shirley New York.
43. On October 8<sup>th</sup> 2019, the Shirley New York Precinct 7 Police entered into Brighter Tomorrow's domestic violence shelter and arrested BIGGERS. They stated they had a warrant for "interference with child custody" and "aggravated kidnapping" of Z. S. issued by El Paso Texas.
44. The States complaining witness who initiated the case against BIGGERS was SIMS.
45. At the time that SIMS assisted the prosecution in securing a felony indictment against BIGGERS, SIMS was banned from any contact with BIGGERS or her household by the terms of his Texas family violence probation. Also, the default divorce Decree was under appeal.
46. Upon arriving to the station, the Suffolk County Fugitive squad reviewed BIGGERS custody order and protective order. They contacted the El Paso County District Attorneys office to inform them



of the Order. According to the Suffolk County Fugitive Squad, El Paso instructed them to send BIGGERS to be extradited back to El Paso anyway.

47. Once it was confirmed that BIGGERS was going to prison to await extradition to El Paso ACS WORKER A met BIGGERS at the station. BIGGERS presented ACS WORKER A with the Protective Order and provided names and contact information on who he was to contact to pick up the BIGGERS' daughters from the 7<sup>th</sup> precinct.
48. Upon arrival to Brighter Tomorrow's BIGGERS secured an agreement with El Paso MOVING COMPANY A to pack and store the 3 bedroom home she fled while being stalked by SIMS. After accepting the job they informed BIGGERS that they were going to fail to complete the job. All of BIGGERS' possessions were taken from the residence including the family vehicle.
49. After being booked into Riverhead Correctional Facility, BIGGERS called ACS WORKER A to ensure that her daughters had been given to the individual which she designated and that the Protective Order was honored. Upon making contact with the ACS WORKER A informed BIGGERS that he contacted Texas Child Protective Services and they instructed him to give Z.S. to SIMS in spite of the protective orders, and give M.F. away to XAVIER FULTON, "FULTON". FULTON had no parental rights, was \$30,000.00 in the arrears on child support and only agreed to make contact with M.F. once in 8 years since she was born.
50. FULTON arrived to New York "hand in hand" with the Probationer, SIMS, assisting him in kidnapping BIGGERS two children. The two men were accompanied by MIKAELA ATRAMMELL-SIMS and ASHLEY FULTON. SIMS left the State of New York and took Z. S. to El Paso Texas. FULTON left the state of New York and took M.F. to Chicago, Illinois.
51. ACS, SIMS, nor FULTON went before any New York Judge before the two children were removed from the State. BIGGERS two daughter were placed in the care of SIMS despite the fact that criminal and civil protective orders were in full force and effect for both children to protect them from SIMS. Since October 8<sup>th</sup>, 2019; BIGGERS has never seen Z. S. again, and only saw M.F. once in an attempt to rescue her.
52. BIGGERS was extradited from New York to El Paso by Prison Transport Systems. The officers brandished weapons at BIGGERS, forced the BIGGERS and the other passengers to ride in a vomit laced van, refused to allow BIGGERS access to a bathroom for more than 12 hours, and forced BIGGERS to eat McDonalds for breakfast, lunch, and dinner everyday for 30 days. The officers also continuously attempted to force BIGGERS to eat pork against her religious beliefs or alternately, gave BIGGERS the option to not eat at all. Biggers suffered cruel and inhuman treatment by Prison Transport Systems and at multiple correctional facilities across the country as she was extradited.
53. Prison Transport Systems also allowed BIGGERS to be threatened and physically attacked by another passenger without intervention, however PRISON TRANSPORT SYSTEMS OFFICER 1 and PRISON TRANSPORT SYSTEMS OFFICER 2 however the two officers displayed pleasure in the attack.
54. When PRISON TRANSPORT SYSTEMS OFFICER 3 learned of BIGGERS protective order, she took the Order from BIGGERS and locked it under the Prison Transport Systems van.
55. When BIGGERS went before the first Judge after extradition, she explained to the Judge that she had custody of the child and an Order of Protection. When the Judge asked to see the Order, Prison Transport c Officer #3 claimed that BIGGERS possessions had been lost.

56. After posting bail, BIGGERS immediately sought to enforce her custody rights to both children. When BIGGERS attempted to have the El Paso County sheriff's enforce the Protective Order for her and Z. S. . The Sheriff refused to enforce the Order. BIGGERS took multiple flight to Chicago to enforce her Protective Order and custody Order for M.F.
57. I'm between attempts to rescue M. F. in Cook County, BIGGERS and FULTON appeared before Judge Randall B ROSENBAUM of Champaign County, Illinois. BIGGERS asked for an emergency enforcement of the Original Order issued of BIGGERS behalf for the child. Attorney LEROY EKECHUWU also appeared. After multiple knowingly false assertions were made to the Court by EKECHUWU, Judge ROSENBAUM informed he parties that by Illinois laws BIGGERS has custody of M. F. Judge ROSENBAUM then Elaborated that he "didn't like the law" From there Judge ROSENBAUM refused to enforce BIGGERS' protective Order and Custody Order. He went on assert he was going to transfer all Motions to Cook County, Illinois to Judge MARY TREW.
58. The Chicago police 7<sup>th</sup> District instructed BIGGERS to travel to Chicago and to present her Orders to Parker Elementary School where FULTON had promptly enrolled M.F. after he captured her in New York. BIGGERS arrived in Chicago and arrived at the station. From there BIGGERS was instructed by the desk SGT to travel to the school with the Custody and protective Order and to dial 911 for Enforcement. Upon arrival to Parker Elementary BIGGERS presented the Order and requested the school release M.F. Parker Elementary School then removed M. F. from the school property out of a back door while they kept BIGGERS in a holding room for nearly an hour.
59. An officer from the 7<sup>th</sup> Precinct that BIGGERS had just left arrived to Parker Elementary School and served BIGGERS with a "short form" Order of Protection on behalf of FULTON. The Cook County Clerk records show no evidence that an Order of Protection existed. Indeed, the record shows that FULTON had applied for an emergency Order of Protection after BIGGERS was arrest, and FULTON'S application was denied twice.
60. Next, BIGGERS had FULTON served on bodycam by the Cook County Sheriff Marcum, Illinois. The Sheriff Ordered FULTON to surrender the child , and FULTON told the Deputy "No". The Sheriff refused to enforce the Order he had just served and allowed FULTON to violate the Order, and to kidnap M.F.
61. BIGGERS the took her Order of Protection to the Cook County Courthouse to have an emergency Judge Order the Sheriff o enforce her Order. BIGGERS went before emergency JUDGE LIONEL JEAN BAPTISTE . BIGGERS explained that FULTON refused to obey the Order and that law enforcement would no enforce it. BIGGERS explained that the Cook County Sheriff and a Private process server had served FULTON. The Cook County Sheriff Marcum refused to enforce the Order that they quizzically drove from Marcum, Illinois to 555 Harrison in downtown Chicago Illinois to serve. BAPTISTE agreed to enforce BIGGERS foreign Protective Order which BIGGERS had already registered in Cook County prior to her arrival.
62. Judge BAPTISTE then instructed BIGGERS to take the Order down to the clerks office for a stamp and for the Sheriff to take BIGGERS to pick up the kidnapped M. F. BIGGERS obtained the clerks stamp and then was instructed to wait for the Sheriff to accompany her to pick up her daughter M.F.
63. As the courthouse was closing, a Deputy informed BIGGERS that Judge BAPTISTE wanted her back in the courtroom. When she arrived there, Judge BAPTISTE informed BIGGERS that he had



spoken to the abuser and the abusers wife ASHLEY FULTON and explained to BIGGERS that she would have to wait for the tow of them to arrive at the courthouse.

64. At nearly 9 pm, Attorney Leroy EKECHUWU, FULTON and his wife arrived and Judge BAPTISTE asked BIGGERS to explain why she had an Order of Protection against FULTON. EKECHUWU worked with the El Paso District Attorney and ISMAEL PEASE to present a fraudulent kidnapping indictment that evening. Judge BAPTISTE asked FULTON a few questions, then he moved to strike his order that he issued instructing the Sheriff to pick up BIGGERS child that day. As he trespassed on the Cook County Courthouse; BAPTISTE wrote Orders stripping BIGGERS of her domestic violence Protective order and Custody Order for M.F. Judge BAPTISTE then contacted Dona Ana County and fraudulently asserted to the Dona Ana County Judge that a "full evidentiary hearing" had taken place, and that FULTON had been awarded full custody of M.F. by him although there was already a Custody matter pending in El Paso Texas. When FULTON kidnapped M.F. he was allowed to unlawfully unenroll her from her EPISD Elementary School (See "Exhibit A")
65. In response, BIGGERS hired Chicago attorneys Marcus Gray and John Buchmiller and Associates to represent her concerning M.F. It appears that all attorneys retained by BIGGERS conspired to deprive BIGGER and M. F. access to one another.
66. In Cook County, Illinois no police officer, sheriff's deputy or Judge would enforce BIGGERS custody and Protective Order for M.F.
67. After BIGGERS late night encounter with Judge BAPTISTE, BIGGERS also contacted Chicago Legal Aid. The attorneys reviewed BIGGERS case, they declined to offer BIGGERS civil representation. The reason for the declination of representation given to BIGGERS was that M. F. had been kidnapped and advised BIGGERS to contact Chicago Police. Chicago Legal Aid explained that their organization can only assist in civil matters, and that the nature of what happened to BIGGERS and M.F. was a crime.
68. March 2021 the NYPD unlawfully gained entry to BIGGERS hotel room. They advised BIGGERS that they were acting on behalf of New York ACS after BIGGERS asked them to correct their error of removing her children from the State of New York without a Judge.
69. On April 1, 2021 BIGGERS moved into a Midtown Manhattan apartment. Three days after move in the landlord, SHELDON JACKLER, "JACKLER" returned and strangled BIGGERS. Upon arrest he asked the officers to "google" BIGGERS to justify his actions. JACKLER and his wife PING PENG JACKLER are currently pursuing a retaliatory eviction against BIGGERS for pressing charges against JACKLER.
70. Shortly after moving into her new apartment and within 10 hours of getting a new Metro PCS phone number, El Paso Texas attorney EDUARDO LERMA, father of BIGGERS' Court appointed attorney in the kidnapping case called BIGGERS new confidential cell phone. EDUARDO LERMA could provide no reasonable explanation as to how he got BIGGERS brand new New York phone number. Shortly thereafter BIGGERS caught EDUARDO LERMA having a conversation with Congresswoman VERONICA ESCOBAR'S Chief of Staff, his son EDUARDO LERMA JR. The conversation includes EDUARDO LERMA SR. discussing the conspiracy to falsely imprison BIGGERS for kidnapping her child. After ED LERMA SR. was caught, VERONICA LERMA withdrew from the case.
71. During the hearing Judge SAM MEDRANO, from the bench, asserted that he had been hand selecting attorneys to be appointed to BIGGERS' case. BIGGERS would later file a Motion to are

use MEDRANO for that reason. MEDRANO would respond by issuing what would be proven to be an unjustifiable extradition warrant for BIGGERS' arrest

72. In October 2021 the NYPD and the US Marshalls arrived to BIGGERS Manhattan apartment at 5:00am to pick her up on a felony warrant for Aggravated Kidnapping. BIGGERS was booked into Riker's Island.
73. At the extradition hearing for BIGGERS, not one scintilla of evidence was presented to justify 915 Bail Bonds seeking revocation nor for Judge Sam Medrano issuing the Warrant for BIGGERS. Judge Barill Ordered BIGGERS be released and denied ADA Ashley Martinez's request that BIGGERS be extradited from New York to El Paso for the second time in the same Aggravated Kidnapping charge.
74. The story of BIGGERS being "Wanted" again hit worldwide media websites.
75. As a result of the above mentioned actions, Z.S. and M.F. were kidnapped. The City of Chicago, the City of New York, and the city of El Paso FBI along with Chicago Illinois Department of Children and Family Services Child Protective Services, El Paso Texas Child Protective Services, Chicago Child Protective Services, New York ACS, El Paso County,Texas, Suffolk County ,New York , New York County ,New York, Bexar County Texas , Cook County, Illinois, Champaign County, Illinois, El Paso County Sheriff, Doña Ana County Sheriff, Cook County Marcum Illinois Sheriff, the Doña Ana County Sheriff, the El Paso Texas Police Department, The Shirley New York 7<sup>th</sup> Precinct Police Department and the NYPD, all failed to intervene in the kidnapping of BIGGERS' children.
76. The terroristic tactics, actions, and events above have caused BIGGERS to be unable to gain employment and has destroyed her professional wrestling career. These actions as well have caused extreme trauma to BIGGERS. It was revealed that BIGGERS kidnapped daughter , M. F. began having panic attacks and was placed on medication by a psychiatrist after she was kidnapped by FULTON and BAPTISTE. FULTON furthermore granted unrestricted access for SIMS to terrorize M. F. who was an eyewitness and victim to SIMS' crimes. BIGGERS therefore seeks relief in the amount of \$3 BILLION Dollars.



El Paso County Sheriff

El Paso Police Department

Dona Ana County Sheriff

Las Cruces Police Department

El Paso Times

Website Doe 1-100

Shirley,NY Police Department

915 Bail Bonds

El Paso Independent School District

SOCORRO ISD

El Paso County, Texas

Bexar County, Texas

Suffolk County,New York

Randolph Airforce Base

Fort Bliss ,Texas

Captain Alex Brown

Pentagon Office of the Inspector General

Cook County, Illinois

Cook County Sheriff

Chicago Police

Chicago Public Schools

Bexar County Probation

El Paso County Probation

El Paso County Attorneys Office

Texas Rio Grande Legal Aid

Stephanie James

Ineke Alderts

Fort Bliss

NY ACS

El Paso Texas CPS

Chicago Illinois CPS

Beto O'Rourke

Leroy Ekechuwu

Yvonne Rosales

Eduardo Lerma

Ed Lerma Jr

Richard Wiles

Jaime Ezparza

Mark Spinn

Ashley Martinez

Alyssa Nava

El Paso Constable 1

Detective Vera

Detective Diaz

Safe Horizons - Brighter Tomorrows

The Reynolds House

CASfV

YWCA Pueblo

El Paso Rio Grande Legal Aid

Colorado Shelter A

Yahara Gutierrez

Ouisa Davis

Ruth Reyes

Veronica Lerma

Bruce Tharpe

Richard Roman

Rafael Morales

Marcus Gray

Leroy Ekechukwu

Lionel Jean Baptiste

"NY Extradition Judge"

Glen Fulton

Xavier Fulton

Mikaela Andrea Trammel Sims

Jesus Urenda

El Paso Collaborative

Patti Olivas

Dan Olivas and Associates

Lorraine Frias

Department of Defense

Carrey Curran

William Beaumont Medical Center Family Advocacy Program

Alex Brown

General Pat White

Chicago Public Schools

Sheldon Jackler

51<sup>st</sup> St Management Corp

Jane Doe 1-100

John Doe 1-100

If the defendant is an individual:

The defendant, N/A, is a citizen of the State of  
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of \_\_\_\_\_.

If the defendant is a corporation:

The defendant, \_\_\_\_\_, is incorporated under the laws of the State of \_\_\_\_\_

and has its principal place of business in the State of \_\_\_\_\_

or is incorporated under the laws of (foreign state) \_\_\_\_\_

and has its principal place of business in \_\_\_\_\_.

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

## II. PARTIES

### A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

<u>TRENESHA</u>	<u>D</u>	<u>BIGGERS</u>
First Name	Middle Initial	Last Name
<u>246 E 51st St #7</u>		
Street Address		
<u>NEW YORK</u>	<u>NY</u>	<u>10022</u>
County, City	State	Zip Code
<u>Confidential</u>		
Telephone Number	Email Address (if available)	